## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE TREMONT SECURITIES LAW, STATE LAW AND INSURANCE LITIGATION

This Document Relates to: All Actions:

Master Docket No: 08 Civ. 11117 (TPG)

## DECLARATION OF VINCENT T. GRESHAM IN SUPPORT OF THE TREMONT FUND OBJECTORS' MOTION FOR THE ENTRY OF A JUDGMENT

- I, Vincent T. Gresham, declare under penalty of perjury, as follows:
- 1. I am counsel for Objectors Bindler Living Trust, Madelyn Haines, William J Millard Trust, Stella Ruggiano Trust, George Turner and Paul Zamrowski. I was admitted pro hac vice in this case on September 24, 2009. I make this declaration voluntarily based on my own personal knowledge and, if called upon to do so, would testify competently thereto.
- 2. Attached hereto as <u>Exhibit 1</u> is a true and correct copy of the Declaration of Lynn O. Keeshan who is the President and Chief Financial Officer of Defendant Tremont Partners, Inc.
- 3. She set forth the amounts that Haines and Zamrowski invested and the amounts that were distributed to them.
- 4. The amounts of the claims for the other four Tremont Fund Objectors were calculated based on the Haines' distributions set forth in the Keeshan Declaration at ¶8 based on their respective investments.
- 5. Based on the numbers in the Keeshan Declaration the following claim amounts were calculated: Bindler -- Contributions-(\$247,500) less Distributions

(\$105,293)= **\$142,207 claim**; Haines -- Contributions-(\$150,000) less Distributions
(\$63,814) = **\$86,186 claim**; Millard -- Contributions-(\$532,150) less Distributions
(\$226,391) = **\$305,759 claim**; Ruggiano -- Contributions-(\$272,250) less Distributions
(\$115,822) = **\$156,428 claim**; Turner -- Contributions-(\$310,000) less Distributions
(\$131,882) = **\$178,118 claim**; and Zamrowski -- Contributions-(\$250,000) less Distributions (\$103,143) = **\$146,857 claim**.

I declare under penalty of perjury, under the laws of the United States, that the foregoing information is true and correct.

Executed in Atlanta, Georgia on 5/28/2015.

/s/ Vincent T. Gresham
Vincent T. Gresham

## **EXHIBIT 1**

UNITED STATES COURT OF APPEA FOR THE SECOND CIRCUIT	ALS		
In re TREMONT SECURITIES LAW	:	Docket No.	11-3899-cv (L) 11-4030-cv (Con)

## DECLARATION OF LYNN O. KEESHAN IN OPPOSITION TO APPELLANTS' MOTION TO FILE A SECOND SURREPLY

Pursuant to 28 U.S.C. § 1746, I, LYNN O. KEESHAN, declare as follows:

- 1. I am the President and Chief Financial Officer of Defendant/Appellee Tremont Partners, Inc. ("TPI").
- 2. TPI is the general partner of Tremont Market Neutral Fund, L.P. ("TMNF") and Tremont Market Neutral Fund II, L.P. ("TMNF II").
- 3. In the wake of the revelation of Bernard Madoff's Ponzi scheme, TPI has been winding down each of TMNF and TMNF II. In that connection, TMNF and TMNF II have sold certain assets and paid certain distributions to limited partners.
- 4. I have reviewed books and records of TMNF and TMNF II kept in the regular course of TPI's business that show the following:
- 5. The Paul L. Zamrowski IRA became a limited partner of TMNF in April 2007, making a \$250,000 investment in that fund.

- 6. The Paul L. Zamrowski IRA has received three distributions in connection with the winding-down of TMNF: (i) \$33,286.84, paid on April 28, 2009; (ii) 58,435.00, paid on June 5, 2009; and (iii) 11,422.00, paid on September 3, 2009. Accordingly, to-date, the Paul L. Zamrowski IRO has received \$103,143.84 in distributions from TMNF.
- 7. The Madelyn C. Haines IRA became a limited partner of TMNF II in August 2008, making a \$150,000 investment in that fund.
- 8. The Madelyn C. Haines IRA has received three distributions in connection with the winding-down of TMNF II: (i) 32,896.27, paid on April 24, 2009; (ii) \$22,746.00, paid on June 2, 2009; and \$8,172.00, paid on September 3, 2009. Accordingly, to-date, the Madelyn C. Haines IRA has received \$63,814.27 in distributions from TMNF II.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 7, 2012, in Westchester, New York.

Lynn O. Keeshan